

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CLIFFORD CASMENTO, JR.,

Plaintiff,

vs.

VOLMAR CONSTRUCTION, INC.,

EFSTATHIA MARINAKIS, and

JOHN VOLANDES,

Defendants.

No. 20 CV 0944 (LJL)

JOINT PROPOSED VOIR DIRE QUESTIONS

Plaintiff Clifford Casmento, Jr. and Defendants Volmar Construction, Inc., Efstathia Marinakis, and John Volandes respectfully submit their proposed joint voir dire in advance of the jury in the captioned action.

Dated: February 16, 2022

For Plaintiff:



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For Defendants:



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PROPOSED VOIR DIRE

Knowledge of the Parties, Counsel, and Witnesses

1. The plaintiff in this case is Mr. Clifford Casmento. Have any of you, a member of your family, or a close friend ever had any dealings with Mr. Casmento that you are aware of?

2. One defendant in this case is Volmar Construction, Inc. (which I may refer to as “Volmar”), a construction company. Have any of you, a member of your family, or a close friend ever had any dealings with Volmar that you are aware of?

3. Have any of you, a member of your family, or a close friend ever worked in or had dealings in the construction industry?

4. Volmar is a private business owned by members of the Volandes and Marinakis families. Have any of you, a member of your family, or a close friend ever had any dealings with the Volandes or Marinakis families that you are aware of?

5. Another defendant is Ms. Efstathia Marinakis, who goes by Effie. Have any of you, a member of your family, or a close friend ever had any dealings with Ms. Marinakis that you are aware of?

6. Another defendant is Mr. John Volandes. Have any of you, a member of your family, or a close friend ever had any dealings with Mr. Volandes that you are aware of?

7. The lawyer representing the Plaintiff is Wesley Mullen of the law firm Mullen P.C. Do any of you know, or know of, this attorney or his law firm?

8. The lawyer representing the Defendants is Gayle Rosen of the law firm Rabinowitz, Galina & Rosen. Do any of you know, or know of, this attorney or her law firm?

9. You will hear from or about several other people during the course of this trial. Do any of you know, or know of, any of the following individuals who are or were affiliated with Volmar: (1) Peter Volandes; Artemios “Michael” Marinakis; Michael Marinakis, Jr.; Vicky Bardabelias; Jazmine Ottley; Hemant Shah; George Kapassakis; and Ted Kouridakis?

Personal Beliefs that Might Prevent Impartiality

10. Do you have any beliefs or feelings about construction companies that would prevent you from being fair and impartial in this case?

11. Have any of you worked in construction?

12. One of the construction projects involved in this case was at a federal building. Do any of you have beliefs about the federal government that would prevent you from being fair and impartial in this case?

13. Do you have any beliefs or feelings about civil lawsuits or the parties that bring them or defend them, that would prevent you from being fair and impartial in this case?

14. Have any of you, a member of your family, or a close friend ever been a whistleblower?

15. Have any of you, a member of your family, or a close friend ever resigned from a job?

16. Have any of you, a member of your family, or a close friend ever been fired from a job?

Jurors' Personal Experiences

17. Have you ever been a juror before? In a civil or criminal matter? Without telling us what the verdict was, did the jury reach a verdict?

18. Have you ever been personally involved in a lawsuit, whether as a plaintiff, defendant, or witness?

19. Have you ever been personally involved in an employment lawsuit, whether as a plaintiff, defendant, or witness?

20. Do you or any of your family members own a business?

21. Do you or any of your family members have employees?

22. Have you, any members of your family, or any close friends ever been charged with a criminal offense, other than a minor traffic violation? If so, please explain the circumstances.

23. Is there anything we have not discussed that would prevent you from being fair and impartial in evaluating the evidence in this case?